

# **EXHIBIT 3**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

\_\_\_\_\_  
)  
ANIBAL RODRIGUEZ, et al. )  
individually and on behalf of )  
all others similarly situated, )

)  
)  
Plaintiffs, )  
)

vs. ) No. 3:20-CV-04688 RS  
)

)  
)  
GOOGLE LLC, et al., )  
)  
)  
Defendants. )  
)  
)

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)  
ATTORNEYS' EYES ONLY - CONFIDENTIAL  
VIDEOTAPED REMOTE DEPOSITION OF BRUCE SCHNEIER, Ph.D.  
Cambridge, Massachusetts  
Monday, July 10, 2023  
Volume I

Reported by:  
CATHERINE A. RYAN, RMR, CRR, B.S.  
CSR No. 8239  
Job No. 5980592  
  
PAGES 1 - 314

1 that even a Google employee, like, knows what's 17:04:56  
2 going on doesn't know what's going on.

3 Q Do you believe that Google employees know  
4 what's going on about every aspect of every  
5 functionality of every product and service Google 17:05:12  
6 has?

7 MR. CROSBY: Object to the form of the  
8 question.

9 THE WITNESS: No.

10 BY MS. AGNOLUCCI: 17:05:19

11 Q Do you believe that a Google employee who  
12 had a misunderstanding about how something worked  
13 can be characterized as knowing what's going on?

14 MR. CROSBY: Object to the form of the  
15 question. 17:05:38

16 THE WITNESS: A general statement -- so  
17 it's a Google employee who has a misunderstanding  
18 and also knows what's going on. That seems -- that  
19 seems plausible, yes.

20 BY MS. AGNOLUCCI: 17:05:56

21 Q You opine in various instances that Google  
22 intentionally designed its disclosures and interface  
23 to deceive users, correct?

24 MR. CROSBY: Object to the form of that  
25 question. 17:06:06

1 THE WITNESS: Do I? I'd like to see that. 17:06:08  
2 I say that they are designed to -- to deceive users.  
3 I don't know if I said they were intended to. So  
4 I'd --  
5 BY MS. AGNOLUCCI: 17:06:22  
6 Q Without looking --  
7 A -- like to see that.  
8 Q Without looking at your report, as you sit  
9 here today, do you have an opinion about whether  
10 Google intended to deceive users? 17:06:32  
11 A You know, it's not an opinion that I would  
12 put in a deposition under oath.  
13 Q You testified earlier that the definition  
14 of "dark patterns" is that they are intended to  
15 manipulate users, correct? 17:06:55  
16 A I believe that is what I said, yes.  
17 Q What is the basis for -- strike that.  
18 Can we go off the record for five minutes?  
19 MR. CROSBY: Sure. We're at about an hour  
20 and seven minutes anyway. So let's just take a 17:07:27  
21 quick --  
22 THE WITNESS: Seems like she breaks a lot.  
23 MS. AGNOLUCCI: Let's take a ten-minute  
24 break.  
25 MR. CROSBY: Okay. We'll back at 17 after 17:07:34

Page 202